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AZ CORP COMMISSION  
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John R. Augustine, Jr. (SBA #013743)  
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Attorney for Respondents Accelerated Success, Inc.  
and Kenneth R. Morris

Arizona Corporation Commission

BEFORE THE ARIZONA CORPORATION COMMISSION

DOCKETED

**WILLIAM A. MUNDELL**  
Chairman

MAY 10 2001

**JIM IRVIN**  
Commission  
**MARC L. SPITZER**  
Commission

DOCKETED BY

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In the matter of:

DOCKET NO. S-03445-01-0000

ACCELERATED SUCCESS, INC..  
500 North Rainbow Boulevard, Suite 300  
Las Vegas, Nevada 89107  
and  
6671 East Baseline Road, #105  
Mesa, Arizona 85206

**RESPONDENTS A.S. I. AND  
MORRIS' FIRST REQUEST  
FOR PRODUCTION OF  
DOCUMENTS AND THINGS**

KENNETH R. MORRIS  
500 North Rainbow Boulevard, Suite 300  
Las Vegas, Nevada 89107

ROBERT D. PIERSON  
6671 East Baseline Road, #105  
Mesa, Arizona 85206

INTEGRITY ASSURED LIFE SETTLEMENTS,  
INC.  
1218 Pulaski Highway, Suite 342  
Bear, Delaware 19701

STEVEN S. LEVINE, d/b/a  
STEVEN S. LEVINE CHARTERED  
11403 Cronridge Road, Suite 230  
Owings Mills, Maryland 21117-2295

(Assigned to ALJ Philip J. Dion, III)

Respondents.

1                   **TO: THE ARIZONA CORPORATION COMMISSION SECURITIES DIVISION AND**  
2                   **ITS COUNSEL**

3                   Respondents Accelerated Success, Inc. and Kenneth R. Morris, by and through their undersigned  
4                   counsel, hereby request that the documents or things designated herein be produced for inspection and  
5                   copying, pursuant to A.R.S. § 41-1062(A)(4). The requested documents are necessary for hearing  
6                   preparation purposes and are not otherwise available to respondents and their counsel.

7                   Except as otherwise agreed by the parties, the time and place of inspection shall be:

8                   DATE AND TIME: June 12, 2001 at 9:00 a.m., or such earlier date the presiding officer may  
9                   direct.

10                  PLACE:               John R. Augustine, Jr., P.C.  
11                                       The Citadel, Suite 300  
12                                       2727 North Third Street  
  Phoenix, Arizona 850004-1001

13                  The documents or things sought by this request include documents and things in the possession,  
14                  custody and/or control of the Securities Division, its predecessors, successors, assigns, related or affiliated  
15                  persons or entities, their attorneys, and all agents, servants, representatives, investigators and others who  
16                  may have obtained custody of the documents or things on behalf of the Securities Division or its counsel.

17                                       **I. DEFINITIONS.**

18                  A.       "Document" refers to any type of printed, typed, recorded, written, graphic or photographic  
19                  matter that either concerns, or was dated or prepared during, the relevant time period, regardless of how it  
20                  was printed, produced, reproduced, coded or stored, and whether it was sent or received. It encompasses  
21                  (1) the original, (2) any note, facsimile, fax, draft, alteration, modification or amendment thereof, (3) any  
22                  reproduction when the original is not within your possession, custody or control, (4) any nonidentical  
23                  reproduction of the original (e.g., subsequent notations on the copy), and (5) both sides of the foregoing.  
24  
25  
26

1 This term includes, but is not necessarily limited to, the following: papers, books, accounts, letters,  
2 models, photographs, films, diagrams, drawings, sketches, blueprints, plans, specifications, objects,  
3 correspondence, messages, telegrams, cables, telex messages, teletypes, facsimiles, faxes, memoranda,  
4 stenographic, handwritten or transcribed notes and notations, work papers and sheets, routing slips,  
5 instructions, orders, intra- and inter-office communications, intra- and inter-departmental communications,  
6 communications of any type to, between or among directors, officers, employees or representatives,  
7 transcripts, memoranda, reports and recordings of telephone conversations, interviews, conferences or  
8 meetings, affidavits, statements, resumes, abstracts, summaries, opinions, court pleadings, price, traffic,  
9 inventory, production, marketing or distribution books, manuals or guides, test reports, reports, indices,  
10 minutes, tabulations, studies, analyses, forecasts, evaluations, contracts, deeds, licenses, agreements,  
11 purchase orders, invoices, notebooks, entries, receipts, checks, ledgers, journals, accounting records,  
12 summaries of accounts, balance sheets, income statements, questionnaires or answers to questionnaires,  
13 statistics or other data compilations, advertisements, publications, brochures, circulars, prospectuses, offers,  
14 press releases, bulletins, pamphlets, trade letters, desk or pocket calendars, appointment books, diaries,  
15 telephone logs, expense accounts, lists, logs, tabulations, charts, graphs, maps, surveys, video or audio  
16 recordings, cassettes, tapes or discs, and any transcriptions thereof, data sheets, computer tapes and discs,  
17 magnetic tapes, punch cards, computer printouts, data processing input and output, computer files,  
18 computer programs, computer program coding sheets, microfilms, microfiche, other electronic,  
19 photographic or mechanical devices or mediums on or through which any type of information is  
20 transmitted, stored, recorded or preserved, and other items similar to any of the foregoing, regardless of  
21 their author, origin, type or denomination by plaintiff.  
22  
23  
24

25 ////  
26

1 B. "Respondent(s)" refers to Accelerated Success, Inc., Kenneth R. Morris, Robert D. Pierson,  
2 Integrity Assured Life Settlement, Inc. and/or Steven S. Levine (d/b/a Steven S. Levine Chartered).

3 C. "You" refers to the Securities Division of the Arizona Corporation Commission or any  
4 other individual or agency acting on its behalf.

5 D. "Commission" refers to the Arizona Corporation Commission.

6 **IV. DOCUMENTS TO BE PRODUCED.**

7 The following documents are to be produced:

8 1. Copies of any and all transcripts of any examination(s)-under-oath, depositions or recorded  
9 interviews involving any respondent(s), witness(es) or other individual(s) possessing knowledge regarding  
10 the allegations in the Securities Division's Notice of Opportunity for Hearing dated April 10, 2001.

11 2. Copies of any and all tape recordings or transcripts of any and all conversations or other  
12 "pitches" taken by any offeree, investor, potential investor or investigator posing or purporting to pose as a  
13 potential investor in the security(ies) which you allege were offered for sale or sold by respondents.  
14

15 3. Copies of any and all memoranda, notes or other documents containing, memorializing or  
16 otherwise setting forth the recollections, knowledge or other information of any witness or potential  
17 witness whom you may call as a witness in the herein matter whether prepared by the you or the witness  
18 him/herself.  
19

20 4. Copies of any and all accounting or other reports wherein you or any of your witnesses set  
21 forth information regarding sources and uses of monies by Respondents.  
22

23 5. Copies of any and all governmental orders, decrees, edicts or other such documents  
24 entered by and governmental agency against or otherwise relating to any of the respondents hereto or  
25 any of their alleged principals or control persons.  
26

6. Copies of any and all documents or other items of evidence which you may offer into evidence at hearing in this matter.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of May, 2001.

JOHN R. AUGUSTINE, JR., P.C.

By 

John R. Augustine, Jr.  
The Citadel, Suite 300  
2727 North Third Street  
Phoenix, Arizona 85004-1106  
Attorney for Respondents ASI and Morris

ORIGINAL and TEN copies of the foregoing filed this 10<sup>th</sup> day of May, 2001 with:

DOCKET CONTROL  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

COPIES of the foregoing mailed/faxed this 10<sup>th</sup> day of May, 2001 to:

Sharon Fox, Esq.  
Securities Division  
Arizona Corporation Comm'n  
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Attorney for the Securities Division

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Washington D.C. 20036  
Attorneys for Respondents Integrity Assured Life Settlements, Inc., and Steven S. Levine

  
John R. Augustine, Jr.

DA...AS I RESPONDENTS ASI AND MORRIS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS